

Topic: Authorizing NPA-NXX Assignment Transfer to Facilitate Establishment of New LRN

Background

As Nebraska continues to take proactive steps to conserve the assigned numbering resources and extend the life of the 402 area code, we have identified that the issuance of codes specifically to allow the assignment of an LRN may cause the exhaust of the 402 area code unrelated to any significant increase in a customer base. This could lead to the implementation of area code relief plans earlier than would otherwise have been needed and thus impose an unnecessary cost and burden on the carriers serving Nebraska and the citizens of Nebraska. We believe this is a situation that exists in other states having a significant rural population base.

Nebraska fully understands and supports the intent of a carrier to obtain numbering resources for the purpose of assigning a Local Routing Number under the INC Location Routing Number (LRN) Assignment Practices, (INC-98-0713-021, Issued January 23, 2004). However, it is extremely frustrating when trying to conserve numbering resources to see a full code assigned to a carrier specifically to associate an LRN to one block, have the remaining 9 blocks returned to the pool, when there is already an excess of resources allocated to the rate center for the existing population base.

This scenario is occurring more frequently in Nebraska as competition begins to move into the rural areas (the good news). However, when the end result is 40,000 numbering resources assigned to a rate center with a population base of 3,599 (the bad news) you begin to wonder. Two of the carriers have returned their 17 unused blocks to the pool but those numbers are still stranded and most likely will never be used.

Current Procedures

The tools to facilitate code reassignment are in place. Current INC Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008, Dated July 23, 2004) provides three situations under which the assignment of an NXX may be transferred from one service provider to another.

Section 6.0, *Responsibilities of Code Applicants and Holders*, specifically in section 6.3.2, states "If the Code Holder no longer provides service in the rate area associated with the NXX code . . . the initial Code Holder shall work cooperatively with the CO Code Administrator and the newly selected Code Holder to transition the default routing functions associated with the NXX code (See Appendix C)."

Section 7.0, *Criteria for the Transfer of Central Office Codes*, provides for the transfer of an NXX code from the current code holder to a service provider making a transfer request when the code is assigned and reserved to a single end-user customer.

Section 8, *Reclamation*, provides for the return/transfer of the assignment of an NXX if it is no longer needed, service is disconnected, or not placed in service within six months. Section 8.2.3 specifies the CO Code Administrator shall use the process outlined in Appendix C.

What is needed is a change to the policies to enable a voluntary transfer of code assignment between LRN/LNP capable carriers in thousands block pooling rate centers.

Requested Action

It is our opinion that encouragement to transfer NXX code assignment to facilitate LRN assignments is an important piece of the numbering resource optimization effort that has been missing. While this method will not address every situation, it will provide some measure of relief, can be implemented with minimal changes, and continues to use the existing association of the ten digit LRN with the six digit NPA-NXX method instead of moving to an association of an LRN at the seven digit, thousands block level.

Nebraska asks that NANC provide direction to the appropriate committee(s) to modify the necessary procedures to

- a) Allow service providers to voluntarily transfer the assignment of an NXX code for the purposes of assigning an LRN and
- b) Allow State regulators to seek delegated authority from the FCC to direct service providers to transfer the assignment of an NXX code to another service provider for the purposes of assigning an LRN to prevent the need to issue of a new NXX code in rate centers that already have an ample supply of numbering resources.

We believe this is an action which can be taken in a short time frame, does not make any substantive changes to current policies and procedures, has minimal impact to service providers or state regulators who chose not to use these options, and continues the Commissions mission of conserving numbering resources.